

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

IN RE )  
           )  
           )  
 ALEXANDER E. JONES         ) CASE NO. 22-33553  
           )  
 DEBTOR.                     ) (CHAPTER 11)  
           )  
           ) JUDGE CHRISTOPHER M. LOPEZ

**SIXTH MONTHLY FEE STATEMENT OF JORDAN & ORTIZ, P.C. FOR  
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AS  
CO-COUNSEL TO THE DEBTOR FOR THE PERIOD FROM  
JULY 1, 2023 THROUGH JULY 31, 2023**

<b>Name of Applicant:</b>	Jordan & Ortiz, P.C. ("J&O")	
<b>Applicant's Role in Case:</b>	Co-Counsel to Debtor	
<b>Date Order of Appointment Signed:</b>	January 20, 2023 (Dkt #105)	
	<b>Beginning of Period</b>	<b>End of Period</b>
<b>Time Period Covered in Statement:</b>	07/1/2023	07/31/2023
<b>Summary of Total Fees and Expenses Requested</b>		
<b>Total Fees Requested in this Statement:</b>	\$4,364.00 (80% of \$5,455.00)	
<b>Total Reimbursable Expenses Requested in this Statement:</b>	\$203.39 <sup>1</sup>	
<b>Summary Attorney Fees for the Period Covered by this Statement</b>		
<b>Attorneys Fees in this Statement:</b>	\$5,455.00	
<b>Total Actual Attorneys Hours Covered by this Statement:</b>	6.30	
<b>Average Hourly Rate for Attorneys:</b>	\$600.00	
<b>Summary Paraprofessional Fees for the Period Covered by this Statement</b>		
<b>Paraprofessional Fees Requested in this Statement:</b>	\$1,675.00	
<b>Total Actual Paraprofessional Hours Covered by this Statement:</b>	6.70	
<b>Average Hourly Rate for Paraprofessionals:</b>	\$250.00	

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<sup>1</sup> The date listed for expenses contained in the attached does not necessarily reflect the date on which the expense was actually incurred by Applicant.

**In accordance with the Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals [ECF #106], each party receiving notice of the monthly fee statement will have 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14 day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.**

### **RELIEF REQUESTED**

1. This is Jordan & Ortiz, P.C.'s ("J&O") sixth monthly fee statement for compensation (the "Fee Statement") for the period of July 1, 2023 through July 31, 2023 (the "Fee Period") pursuant to the Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals [ECF #106] (the "Interim Compensation Order"). J&O is filing its first amended monthly fee statement for compensation showing that J&O requests: (a) allowance of compensation in the amount of \$4,364.00 (80% of \$5,455.00) for actual, reasonable, and necessary professional services rendered to the Debtor by J&O and (b) reimbursement of actual, reasonable, and necessary costs and expenses in the amount of \$0.00 incurred by J&O during the Fee Period. By this Fee Statement, J&O seeks interim allowance of compensation for services rendered and reimbursement of expenses incurred solely in connection with its work performed on behalf of the Debtor.

### **SERVICES RENDERED AND DISBURSEMENTS INCURRED**

2. Attached above as Exhibit "A" is the Fee Statement for the period July 1, 2023 through July 31, 2023, which includes a summary of professionals who rendered services to the Debtor during the Fee Period, including each person's billing rate and the fees incurred during the Fee Period summarized by task code and the itemized schedule of expenses within each category, including description, incurred with the amounts for which reimbursement is requested. Exhibit

“A” also shows the fee statements that were included in the First Interim Application for fees and expenses from December 1, 2022 through May 15, 2023 (Docket #306) and Ordered to be paid (Docket #346). Attached as Exhibit “B” is a Task Code breakdown by Attorney and Paralegal.

### **NOTICE AND OBJECTION PROCEDURES**

3. Pursuant to the Interim Compensation Order notice of this Fee Statement has been provided to:

- a. Debtor Counsel, Crowe & Dunlevy, PC, 2525 McKinnon St, Ste. 425, Dallas, TX 75201 (Attn: Vickie L. Driver, [dallaservice@crowedunlevy.com](mailto:dallaservice@crowedunlevy.com))
- b. U.S. Trustee c/o/ Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St Ste 3516 Houston, TX 77002, [ha.nguyen@usdoj.gov](mailto:ha.nguyen@usdoj.gov), [jayson.b.ruff@usdoj.gov](mailto:jayson.b.ruff@usdoj.gov)
- c. Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimimage, Jr., Sara L. Brauner and Melanie A. Miller; [dzensky@akingump.com](mailto:dzensky@akingump.com), [mbrimimage@akingump.com](mailto:mbrimimage@akingump.com), [sbrauner@akingump.com](mailto:sbrauner@akingump.com), [melanie.miller@akingump.com](mailto:melanie.miller@akingump.com))
- d. Connecticut Plaintiffs, (a) Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, [ASterling@koskoff.com](mailto:ASterling@koskoff.com)) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, [kkimpler@paulweiss.com](mailto:kkimpler@paulweiss.com), [msalvucci@paulweiss.com](mailto:msalvucci@paulweiss.com))
- e. Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, [avi.moshenberg@mhllp.com](mailto:avi.moshenberg@mhllp.com)) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, [Jarrod.Martin@chamberlainlaw.com](mailto:Jarrod.Martin@chamberlainlaw.com))
- f. All parties that receive ECF notifications

In light of the nature of the relief requested herein, J&O submits that no further or other notice is required.

4. Pursuant to the Interim Compensation Order (ECF #106), the Notice Parties and parties in interest have 14 days after service of the Monthly Fee Statement to object to the requested

fees and expenses. If any Notice Party, or any other party in interest, objects to a Retained Professional's Monthly Fee Statement, it must serve on the affected Retained Professional and each of the other Notice Parties a written objection (the "Objection") so that it is received on or before the Objection Deadline. Thereafter, the objecting party and the affected Retained Professional may attempt to resolve the Objection on a consensual basis. If the parties are unable to reach a resolution of the Objection within 14 days after service of the Objection, or such later date as may be agreed upon by the objecting party and the affected Retained Professional, the affected Retained Professional may either: (i) file a response to the Objection with the Court, together with a request for payment of the difference, if any, between the Maximum Payment and the Authorized Payment made to the affected Retained Professional (the "Incremental Amount") and schedule such matter for hearing on at least 14 days' notice; or (ii) forego payment of the Incremental Amount until the next interim or final fee application hearing, at which time the Court will consider and dispose of the Objection if requested by the affected Retained Professional. Failure by a Notice Party, or any other party in interest, to object to a Monthly Fee Statement shall not constitute a waiver of any kind nor prejudice that party's right to object to any Interim Fee Application (as defined below) subsequently filed by a Retained Professional.

5. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. J&O reserves the right to make further application to this Court for allowance of such fees and expenses not included herein, or correct and erroneous or errors set out herein. Subsequent Monthly Fee Statements will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Interim Compensation Order.

WHEREFORE, pursuant to the Interim Compensation Order, and pending the expiration of the objection deadline, if no objections to the Fee Statement are received, J&O respectfully requests: (a) that it be allowed on an interim basis (i) \$4,364.00 (80% of fees in the amount of \$5,455.00) for reasonable, actual and necessary services rendered by it on behalf of the Debtor during the Fee Period and (ii) reimbursement of \$0.00 for reasonable, actual and necessary expenses incurred during the Fee Period; (b) that the Debtor be authorized and directed to immediately pay to J&O the amount of \$4,364.00 which is equal to the sum of 80% of J&O's fees and 100% of J&O's expenses incurred during the Fee Period, and (c) and granting such other and further relief as the Court may deem just and proper.

Dated: August 17, 2023

/s/ Shelby A. Jordan

SHELBY A. JORDAN

State Bar No. 11016700

S.D. No. 2195

ANTONIO ORTIZ

State Bar No. 24074839

S.D. No. 1127322

***Jordan & Ortiz, P.C.***

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Corpus Christi, TX 78401

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[aortiz@jhwclaw.com](mailto:aortiz@jhwclaw.com)

Copy to: [cmadden@jhwclaw.com](mailto:cmadden@jhwclaw.com)

**CO-COUNSEL FOR DEBTOR**

## CERTIFICATE OF SERVICE

I certify that on August 17, 2023, a true and correct copy of the foregoing pleading was served upon the parties listed on the attached service list via the Court's ECF system and pursuant to Local Rule 9003-1, via e mail or U.S. mail as follows:

- a. Debtor Counsel, Crowe & Dunlevy, PC, 2525 McKinnon St, Ste. 425, Dallas, TX 75201 (Attn: Vickie L. Driver, [dallaservice@crowedunlevy.com](mailto:dallaservice@crowedunlevy.com))
- b. U.S. Trustee c/o Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St Ste 3516 Houston, TX 77002, [ha.nguyen@usdoj.gov](mailto:ha.nguyen@usdoj.gov), [jayson.b.ruff@usdoj.gov](mailto:jayson.b.ruff@usdoj.gov)
- c. Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimimage, Jr., Sara L. Brauner and Melanie A. Miller; [dzensky@akingump.com](mailto:dzensky@akingump.com), [mbrimimage@akingump.com](mailto:mbrimimage@akingump.com), [sbrauner@akingump.com](mailto:sbrauner@akingump.com), [melanie.miller@akingump.com](mailto:melanie.miller@akingump.com))
- d. Connecticut Plaintiffs, (a) Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, [ASterling@koskoff.com](mailto:ASterling@koskoff.com)) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, [kkimpler@paulweiss.com](mailto:kkimpler@paulweiss.com), [msalvucci@paulweiss.com](mailto:msalvucci@paulweiss.com))
- e. Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, [avi.moshenberg@mhlpp.com](mailto:avi.moshenberg@mhlpp.com)) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, [Jarrod.Martin@chamberlainlaw.com](mailto:Jarrod.Martin@chamberlainlaw.com))
- f. All parties that receive ECF notifications

*/s/ Shelby A. Jordan*

Shelby A. Jordan

**EXHIBIT "A"**

**JORDAN & ORTIZ, P.C. INVOICES FOR PERIOD**  
**December 1, 2022 through June 30, 2023**

**SUMMARY OF PREVIOUS INVOICES THAT HAVE BEEN ORDERED  
TO BE PAID UNDER DOCKET #346**

<u>Invoice No.</u>	<u>Month Billed</u>	<u>Invoice Date</u>	<u>Fees</u>	<u>Expenses</u>	<u>Invoice Total</u>	<u>Amount Applied</u>	<u>Remaining Balance Due</u>
922199	December	1/27/23	\$77,362.50	\$506.65	\$77,869.15	-\$62,396.65	\$15,472.50
922213	January	2/15/23	\$28,125.00	\$102.50	\$28,227.50	-\$22,602.50	\$5,625.00
922268	February	3/2/23	\$51,205.00	\$22.44	\$51,227.44	-\$40,986.44	\$10,241.00
922376	March	4/6/23	\$46,820.00	\$120.30	\$46,940.30	-\$20,804.57	\$26,135.73
922405	April	5/4/23	\$15,560.00	\$0.00	\$15,560.00	\$0.00	\$15,560.00
922449	May 1-15	5/18/23	\$24,550.00	\$315.70	\$24,865.70	\$0.00	\$24,865.70
922462	May 16-31	6/8/23	\$9,925.00	\$189.09	\$10,114.09	\$0.00	\$10,114.09
922517	June	7/11/23	\$9,420.00	\$14.30	\$9,434.30	\$0.00	\$9,434.30
922607	July	8/3/23	\$5,455.00	\$0.00	\$5,455.00	\$0.00	\$5,455.00
<b>TOTAL</b>				<b>\$1,270.98</b>	<b>\$269,693.48</b>	<b>-\$146,790.16</b>	<b>\$122,903.32</b>

500 N. SHORELINE BLVD, SUITE 804  
 CORPUS CHRISTI, TEXAS 78401-0341  
 TAX ID NO. 74-2553880  
 (361) 884-5678

JONES, ALEX  
 alexejones1777@gmail.com

Page: 1  
 August 03, 2023  
 Account No: 5481-002000M  
 Statement No: 922607

Bankruptcy

PREVIOUS BALANCE					
					\$117,448.32

07/07/2023	SAJ	B110	A104	Work on edits on employment agreement for client with FSS.	Hours 1.80
07/09/2023	SAJ	B110	A104	Pull prior employment agreement and review the employment agreement contract and compare issues.	0.40
07/10/2023	SAJ	B110	A103	Finish edits to employment agreement and forward to co-counsel with email and indemnity question.	0.40
07/13/2023	SAJ	B190	A104	Work on document production for client's efforts to acquire annuity under employment agreement and email to co-counsel regarding attorney client privileged communications.	0.60
07/14/2023	CRM	B190	A104	Email from Shelby Jordan to pull emails regarding annuity for possible production for Vickie Driver and begin pulling.	2.00
	SAJ	B190	A104	Begin to pull emails regarding annuities and emails to co-counsel regarding same.	1.00
07/17/2023	CRM	B190	A104	Continue to pull emails regarding annuity for possible production for Vickie Driver.	2.20
07/18/2023	CRM	B190	A104	Continue to pull emails regarding annuity for possible production for Vickie Driver and email same to Shelby Jordan.	1.00
	CRM	B160	A103	Prepare draft of fifth notice of monthly fee statements for May and June and email same to Shelby Jordan for revisions and approval to file.	1.00
07/19/2023	CRM	B160	A103	File and serve 5th monthly fee statement.	0.50
07/20/2023	SAJ	B190	A104	Work on document email production (AEJ regarding annuity efforts to purchase) to forward to co-counsel summary of background on annuity planning and transactions.	1.10
07/24/2023	SAJ	B190	A104	Finish internal review of email to pull all relevant to annuity issue and email to co-counsel that none extra are found.	0.70

JONES, ALEX

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August 03, 2023

Account No: 5481-002000M

Statement No: 922607

Bankruptcy

					Hours
07/25/2023	SAJ	B190	A107	Email to co-counsel regarding production of emails from J&O regarding annuity and pull ones marked by J&O as non-privileged.	0.30
				For Current Services Rendered	<u>13.00</u>
					<u>5,455.00</u>

Recapitulation					
<u>Timekeeper</u>	<u>Title</u>		<u>Hours</u>	<u>Rate</u>	<u>Total</u>
SHELBY A. JORDAN	Partners		6.30	\$600.00	\$3,780.00
CHRYSTAL MADDEN	Paralegals		6.70	250.00	1,675.00

07/31/2023	B110	E106	Pacer		
			Total Current Work		5,455.00
			Balance Due		<u>\$122,903.32</u>

<u>Task Code Summary</u>		
	<u>Fees</u>	<u>Expenses</u>
B110 Case Administration	1560.00	0.00
B160 Fee/Employment Applications	375.00	0.00
B190 Other Contested Matters (excluding assumption/rejection motions)	3520.00	0.00
B100 Administration	<u>5,455.00</u>	<u>0.00</u>

**EXHIBIT "B"****TASK CODES**

<b><u>CATEGORIES</u></b>	<b><u>ATTORNEY TIME</u></b>	<b><u>PARALEGAL TIME</u></b>
B110 Case Administration	2.6	
B120 Asset Analysis and Recovery		
B130 Asset Disposition		
B140 Relief from Stay/Adequate Protection		
B150 Meetings of & Communications with Creditors		
B160 Fee/Employment Applications		1.5
B170 Fee/Employment Objections		
B180 Avoidance Action Analysis		
B185 Assumption/Rejection of Executory Contracts		
B190 Other Contested Matters	3.7	5.2
B195 Non-Working Travel		
B210 Business Operations		
B220 Employee Benefits/Pensions		
B230 Financing/Cash Collections		
B240 Tax Issues		
B250 Real Estate		
B260 Board of Directors Matters		
B310 Claims Administration and Objections		
B320 Plan and Disclosure Statement		
B410 General Bankruptcy Advice/Opinions		
B420 Restructurings		
<b>TOTALS:</b>	<b>6.3</b>	<b>6.7</b>